



remaining are state pre-trial detainees. First, as to female ICE detainees, there are currently only six (6), all of whom are housed in Unit “EB” on the main campus. There are a total of 16 cells in EB. They are 80 square feet in size (8’ x 10’). 8 cells are located on the ground level and another 8 are on the mezzanine level. Each of the 16 cells has a single double bunk bed. All six female ICE detainees are housed in a cell without a roommate. In fact, all detainees and inmates in EB are in a cell by themselves. Also, in EB, there is a common bathroom on both levels, each has 2 toilets and 2 sinks. The bathroom on the ground level, which is 7’ x 9’, has a single shower, while the mezzanine level has 2 showers. There is a Common Area, which is 33’ x 20’, in EB which contains an Officer’s Control Desk, a separate Education//Program Room, measuring 10’ x 12’, with 1 large table and 16 chairs, as well as 2 small tables with 4 chairs each. The Common Area is used for dining, playing cards, watching TV, and writing letters. Lastly, there is an outside recreation area located off the Common Area which is approximately 1500 square feet in size.. The Common Area, Recreation Area, Main Area, and Education/Program Room are all sufficiently sized to allow the detainees (and the inmates) to practice social distancing.

### **2 East Unit**

4. ICE detainees who are males are housed in two separate buildings. The first unit building is called “2 East,” High risk male ICE detainees are housed there with state pre-trial detainees. This unit is part of our Mods unit and has a capacity for 104 persons; however, there are currently only 44 ICE detainees occupying 2 East, along with 20 state pre-trial inmates, for a total of 64 male occupants. However, I am

- informed that 1 ICE detainee will be removed from 2 East next week to effectuate his removal. These current 44 ICE detainees are divided into 8 cells, each of which measures 330 square feet (30' x 11'). There are a total of 13 cells at 2 East. Each cell has a capacity for 8 detainees. Because of the size of the 2 East population, no cell is at full capacity. In 2 East, the 13 cells are approximately 330 square feet (30' x 11') in size. Seven (7) cells are located on the north side of the room, which is divided by a hall, and the other 6 are on the opposite side of the room (south).
5. With regard to ICE detainees in 2 East, by order: Cell- 241 has 5 detainees; Cell- 242 has 6 detainees; Cell- 244 has 4 detainees; Cell -246 has 7 detainees; Cell-248 has 6 detainees; Cell- 250 has 7 detainees; Cell- 252 has 5 detainees; and, Cell -254 has 4 detainees. The other 5 cells are occupied by state pre-trial inmates. Each cell contains 3 double bunk beds on one wall (each bunk bed unit is separated by approximately 7"-34" between the foot end of one bunk and the head end of the next bunk, which means that detainees' heads are at least 6-8 feet apart), with remaining single double bunk beds situated 6'-7' across the cell on the other wall. The bottom bunk bed is approximately 3' below the upper bunk bed.
  6. Lastly, there is a hallway in the 2 East facility that measures 30' x 7'. All of these areas have sufficient space for the current population to practice appropriate social distancing.
  7. There are 2 bathroom/shower rooms in 2 East. The bathrooms are 21' x 9' in size. One is located on the North side, while the other is on the South side. The North side bathroom/shower room has 3 toilets, 5 showers, 6 sinks, and 2 urinals. The South side bathroom/shower room has 4 toilets, 5 showers, 7 sinks, and 1 urinal. The

bathroom/shower areas have sufficient space for the current population to practice appropriate social distancing.

8. Unit 2 East has one large Common Area 59' x 30', which contains an Officer's Control Desk, which has 6 long tables with 8 chairs for each, 2 medium size tables with 4 chairs per table, and 5 round tables with 4 chairs. These tables are spaced between 5'-6' apart. The Main Area is used for dining and dayroom used for playing cards, watching TV, playing games, and writing letters. There is an outside recreational area the size of a football field (160' x 280') which has a walking path, a grass area for activities, and asphalt area with a basketball court. All of these areas have sufficient space for the current population to practice appropriate social distancing.
9. With the present configuration of the cells and placement of the bunk beds, there is more than adequate space for 6' social distancing recommended by the Centers for Disease Control ("CDC").

### **C. Carlos Carreiro Immigration Detention Center**

10. The last facility housing ICE detainees is the C. Carlos Carreiro Immigration Detention Center (the "Center"). This facility is divided into Unit A and Unit B. These are separate and distinct units, with separate housing, dining and recreational areas.

#### **Unit A**

11. In Unit A, there are 30 ICE detainees, even though there is capacity for 66 detainees. However, I am informed that 1 detainee will be removed from Unit A next week so

he can be removed. Unit A (like Unit B) is dormitory style, containing no cells. Unit A (also like Unit B) has 66 beds (33 double bunk beds) which are placed in 5 horizontal rows in an area approximately 1624 square feet (28' x 58'). As of April 6, 2020, the BCHOC has assigned detainees so that only every other row is occupied.. For example, there are 5 rows of bunk beds in Unit A, 3 rows have 7 bunk beds per row (4' separating each bunk bed), while the other 2 rows have 6 bunk beds per row, with the same 4' separation between beds. To separate the detainees in their sleeping quarters, Row 1 is occupied by 13 detainees, Row 2 has no detainees, Row 3 has 7 detainees, while Row 4 is empty, and Row 5 is occupied by 10 detainees. This provides significant space between the rows (approximately 12' feet) occupied with detainees and those that are empty.

12. Beyond the last row of beds, there is a Common Area about 13' away. The Common Area approximates 3100 square feet comprised of 8 round tables, each 8 feet in diameter, with 8 chairs for each. These tables are used for dining, playing games and watching TV. Also, there is a separate Laundry Room which measures 9' x 10', with two washers and 2 dryers in the room. There is a separate Visitors Room measuring 13' x 10', as well as a very large Bathroom/Shower room measuring 19' x 35'. Within the bathroom, there are 8 sinks, 6 showers, 3 urinals and 6 toilets. Unit A has a separate Classroom that is 18' x 19' in size, where detainees can read and study. Finally, it has an outdoor recreational area that is 30' x 54' where detainees typically play pick up soccer. Each of these areas is sufficiently sized that the current detainee population can practice appropriate social distancing if they wish to do so. The laundry room cannot handle more than two detainees using it at a time, but this is not

an impediment to social distancing because of the function for that room. In sum, the Common Area that holds the bunk beds and tables measures 108' x 48' in size.

13. Lastly, Unit A has a separate dedicated medical office measuring 14' x 12'. This room is staffed by a nurse who dispenses medication to the detainees as prescribed and attends to detainee medical calls as needed. Detainees visit the office one at a time when summoned. Should a detainee require greater care, he is transported to the main campus to the larger medical unit.

### **Unit B**

14. Unit B in the Carreiro Correia Center mirrors Unit A in layout and dimensions. Briefly, it has 5 rows of bunk beds running horizontally, with 3 rows containing 7 bunk beds, while 2 rows have 6 bunk beds. In this regard, Row 1 is occupied by 14 detainees, Row 2 is empty, Row 3 has 14 detainees, Row 4 is empty and Row 5 has 12 detainees. Like Unit A, there also is a Common Area (3100 square feet approximately) comprised of 8 round tables with 8 chairs for each, all situated in the same special area as Unit A's Common Area. These tables are used for playing games, programs, watching TV and for dining. The remaining rooms in Unit B are the same as Unit A and are nearly identical in dimensions; thus, this declaration will not belabor this Court with a repetition of those facts.
15. All detainees have access to the bathroom and shower facility; however, they are encouraged to limit the number of occupants in the area for social distancing purposes. All signs have been posted in three languages. There are also signs throughout Units A, Unit B, EB and 2 East instructing ICE detainees to continually practice social distancing as recommended by the CDC.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS NINTH DAY OF  
APRIL, 2020.

/s/ Steven Souza  
STEVEN SOUZA,  
Superintendent,  
Bristol County House of Corrections

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